

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

TRACY ADAMS, on behalf of herself and all  
others similarly situated,

Plaintiff(s),

Case No. 2:18-CV-12731

v.

Judge Denise Page Hood

SETERUS, INC.,

Magistrate Judge Elizabeth A. Stafford

Defendant(s).

**STATEMENT OF DISCLOSURE  
OF CORPORATE AFFILIATIONS AND FINANCIAL INTEREST**

Pursuant to E. D. Mich. LR 83.4, Defendant Seterus, Inc.

makes the following disclosure: *(NOTE: A negative report, if appropriate, is required.)*

1. Is said corporate party a subsidiary or affiliate of a publicly owned corporation?

Yes ☒ No ☐

If the answer is yes, list below the identity of the parent corporation or affiliate and the relationship between it and the named party.

Parent Corporation/Affiliate Name: Kyanite Services, Inc.; Pixel Acquisition Corp.; and International Business Machines Corporation ("IBM")

Relationship with Named Party: Seterus, Inc. is a wholly owned subsidiary of Kyanite Services, Inc., which is wholly owned by Pixel Acquisition Corp., which is wholly owned by International Business Machines Corporation ("IBM"). IBM is a publicly held company.

2. Is there a publicly owned corporation or its affiliate, not a party to the case, that has a substantial financial interest in the outcome of the litigation?

Yes ☐ No ☒

If the answer is yes, list the identity of such corporation or affiliate and the nature of the financial interest.

Parent Corporation/Affiliate Name:

Nature of Financial Interest:

Date: September 27, 2018

/s/ James A. Martone

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DICKINSON WRIGHT PLLC  
2600 W. Big Beaver Rd., Ste. 300  
Troy, MI 48084  
(248) 433-7200  
jmartone@dickinsonwright.com